

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OLLIE GREENE, et al.,

Plaintiffs,

v.

TOYOTA MOTOR CORP., et al.,

Defendants.

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Civil Action No. 3:11-CV-0207-N

**PLAINTIFFS' SUPPLEMENT TO PLAINTIFFS' EMERGENCY MOTION
TO EXTEND DATE FOR REBUTTAL EXPERT DISCLOSURE AND REPORTS**

Plaintiffs Ollie Greene, Individually and as the surviving parent of Wyndell Greene, Sr., William Greene, as the Administrator of the Estate of Wyndell Greene, Sr. and Marilyn Burdette Hardeman, Individually and as the surviving parent of LaKeysha Greene (collectively hereinafter referred to as "Plaintiffs") submit the following attachments in the interest of optional completeness since (1) the Court made inquiry as to whether Plaintiffs' counsel attempted to confer on the motion; and (2) Defendants refused to fully inform the Court of the communications between the parties on this subject:

- Exhibit 1:** Email from Plaintiffs' counsel to Defendants' counsel (a total of 14) asking for their position on the Motion to extend the rebuttal deadline that Plaintiffs were contemplating. Despite that Plaintiffs' counsel received "read receipts" from Defendants' counsels, not a single one of the 14 Defendants' counsels gave Plaintiffs' counsel the courtesy of a reply;
- Exhibit 2:** Plaintiffs' response to Toyota's offer to confer on the motion, wherein Plaintiffs explained the background of the request, the need for the time and why Plaintiffs were unable to inspect the crash vehicles on January 3; and
- Exhibit 3:** Email from Plaintiffs' counsel to Defendants' counsel responding to the "offer" that Defendants included in their response.

Also, Defendants miscount the due date for rebuttal reports. The original due date was 105 days from the March 10, 2014 trial date. When the Court granted a 30 day and later a 10 day change, the new date became 65 days from the March 10, 2014 trial date (January 4, 2014).

Respectfully Submitted,

/s/ Aubrey "Nick" Pittman

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CERTIFICATE OF SERVICE

I hereby certify that on January 3, 2014, the foregoing pleading was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Aubrey "Nick" Pittman
AUBREY "NICK" PITTMAN